

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	
	§	CHAPTER 7
	§	
LEGENDARY FIELD EXHIBITIONS, LLC;	§	CASE NO. 19-50900-CAG
	§	
AAF PLAYERS, LLC;	§	CASE NO. 19-50902-CAG
	§	
AAF PROPERTIES, LLC;	§	CASE NO. 19-50903-CAG
	§	
EBERSOL SPORTS MEDIA GROUP, INC.;	§	CASE NO. 19-50904-CAG
	§	
LFE 2, LLC;	§	CASE NO. 19-50905-CAG
	§	
WE ARE REALTIME, LLC	§	CASE NO. 19-50906-CAG
	§	
DEBTORS		(SUBSTANTIVE CONSOLIDATION OF ALL 6 CASES, INTO ONE CASE, LEGENDARY FIELD EXHIBITIONS, LLC, CASE NO. 19-50900-CAG) JOINTLY ADMINISTERED UNDER CASE NO. 19-50900-CAG

MOTION TO RATIFY PAYMENTS AS ADMINISTRATIVE EXPENSE, FROM FUNDS OF
THE ESTATE
(WITH 21-DAY LANGUAGE)

**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR
INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS FROM
THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED
WITHOUT A HEARING BEING HELD.**

A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE HELD.

A copy of the proposed Order attached as
Exhibit "A".

NOW COMES RANDOLPH N. OSHEROW, TRUSTEE (“Trustee”), the Chapter 7 Trustee of the Consolidated bankruptcy estate of **LEGENDARY FIELD EXHIBITIONS, LLC** and files his Motion to Ratify Payments to:

a. 10,000.00 payable to Darwin Beacham, to do the inventory on the assets in the case, as an Administrative Expense, and

b. Randolph N. Osherow, in the amount of \$4000.00, to cover in part, the costs of sending out Notices Via The Noticing Center in regards to the Consolidation of the 6 cases, Motion to Ratify Payments, Motion to Hire and Pay Robert Parker, Motion to Hire and Pay Frank L. Sughrue as Liquidator and Motion to Limit Mailing Matrix by “The Noticing Center”.

c. \$5464.00 for moving the equipment in Atlanta, Georgia back to San Antonio, Texas payable to “M3 Commercial Moving and Logistics”.

Trustee would show the Court the following:


1. On 4/17/19 the consolidated cases were filed as Chapter 7 Bankruptcies under Chapter 7 of the Bankruptcy Code. On 4/17/19, Randolph N. Osherow was appointed Chapter 7 Trustee of consolidated Debtor entities bankruptcy estates and continues to act in that capacity.
2. In the course of administering the bankruptcy estate, it is necessary for the Trustee to do an accurate inventory sufficient to sell the assets of the football equipment that will be liquidated. The bankruptcy schedules did not have a specific inventory sufficient to conduct a sale. It is necessary to pay DARWIN BEACHAM, \$10,000.00, to do the inventory on the football equipment, as an administrative claim.: the Trustee has paid a \$5000;00 down payment to DARWIN BEACHAM and once DARWIN BEACHAM has completed the task/ inventory the remaining \$5000.00 will be paid, for a total of \$10,000.00. The Trustee requests the Court ratify these 2 payments of \$5,000.00 each to DARWIN BEACHAM.

3. The Trustee must pay for miscellaneous initial Notices Sent Out including a Motion to Consolidate the 6 cases via THE NOTICING CENTER, same entity used by the Bankruptcy Clerk's Office at 7 cents per page, and 50 cents postage. Trustee's personal credit card will be used and the Trustee asks the court to Ratify the reimbursement of \$4,000.00, to the Trustee from the Bankruptcy Estate funds.

4. The Trustee has paid \$5464.00 to ship equipment from the Atlanta, GA football team back to San Antonio to M3 Commercial Moving and Logistics. The Trustee paid this shipping charge to move the equipment back to San Antonio, Texas for sale, and asks the Court to ratify this payment made by the Trustee.

WHEREFORE, PREMISES CONSIDERED, Trustee prays that this Court enter an order to ratify payments made to i. DARWIN BEACHAM of \$10,000.00, to do the inventory on the football equipment, and ii. to Randolph N. Osherow in the amount of \$4000.00, in regards to initial Notices Sent Out by The Noticing Center, to Consolidate the 6 cases, Limit Mailing matrix, To Hire and Pay Robert Parker, To Hire and Pay Frank L. Sughrue, Liquidator, & iii To Pay M3 Moving and Logistics \$5464.00, to move equipment in Atlanta, Georgia to San Antonio, Texas.

Respectfully submitted the 9th day of May, 2019.



/s/ Randolph N. Osherow
RANDOLPH N. OSHEROW
Texas State Bar No. 15335500
342 West Woodlawn, Suite 100
San Antonio, Texas 78212
(210) 738-3001 – Telephone
(210) 737-6312 - Telefax
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Chapter 7 Trustee

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DEBTORS		(SUBSTANTIVE CONSOLIDATION OF ALL 6 CASES, INTO ONE CASE, LEGENDARY FIELD EXHIBITIONS, LLC, CASE NO. 19-50900-CAG) JOINTLY ADMINISTERED UNDER CASE NO. 19-50900-CAG

EXHIBIT "A"

On the day this Order was signed, came for consideration the Trustee's Motion to Ratify the following Payments:

- a. DARWIN BEACHAM-\$10,000.00, to do the inventory on the assets in the case, as an Administrative Expense, and
- b. Randolph N. Osherow in the amount of \$4000.00, to send out Noticing in regards to Notices Sent Out to Consolidate the 6 cases, Motion to Ratify Payments on Motion to Hire and Pay Robert Parker, Motion to Hire and Pay Frank L. Sughrue as Liquidator and Motion to Limit Mailing Matrix, Via "The Noticing Center".
- c. \$5464.00 to "M3 Commercial Moving and Logistics", for moving the equipment in Atlanta, Georgia back to San Antonio, Texas "M3 Commercial Moving and Logistics". Trustee would show the Court the following:

The Court having considered the Motion finds that it has merit and should be granted. It is, therefore,

ORDERED, ADJUDGED, and DECREED that the payments to:

- a. DARWIN BEACHAM of \$10,000.00, to do the inventory on the assets in the case, as an Administrative Expense,
- b. Randolph N. Osherow in the amount of \$4000.00, to send out Notices to Consolidate the 6 cases, Motion to Ratify Payments on Motion to Hire and Pay Robert Parker, Motion to Hire and Pay Frank L. Sughrue as Liquidator and Motion to Limit Mailing Matrix, &
- c. \$5464.00 payable to "M3 Commercial Moving and Logistics" for moving the equipment in Atlanta, Georgia back to San Antonio, Texas, are hereby authorized and ratified.

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RANDOLPH N. OSHEROW
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CERTIFICATE OF MAILING

I certify that a true and correct copy of MOTION TO RATIFY PAYMENTS FROM FUNDS OF THE ESTATE was served Via U.S. first class mail, postage prepaid by the Noticing Center, on the parties set forth on the attached service list, on this 9th day of May, 2019:

Debtor Company
4525 Macro
San Antonio, TX 78218

FLS Auction, Inc.
5118 Barth Rd.
Lockhart, TX 78644
Liquidator

Darwin Beacham
13423 Frio Parke
San Antonio, TX 78254

Robert Parker
2503 Ridgewind Way
Windermere, FL 34786

U.S. Trustee
PO Box 1539
San Antonio, TX 78295

William A. (Trey) Wood, III
Bracewell LLP
711 Louisiana Suite 2300
Houston, TX 77002
Attorney for Debtor Company
Counsel for Debtor(s)

All interested parties on the mailing matrix attached will be noticed by "The Noticing Center".

/s/ Randolph N. Osherow
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Chapter 7 Trustee